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Attorneys for Defendant  
 CITY AND COUNTY OF SAN FRANCISCO

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

HASTINGS COLLEGE OF THE LAW, a  
 public trust and institution of higher education  
 duly organized under the laws and the  
 Constitution of the State of California;  
 FALLON VICTORIA, an individual; RENE  
 DENIS, an individual; TENDERLOIN  
 MERCHANTS AND PROPERTY  
 ASSOCIATION, a business association;  
 RANDY HUGHES, an individual; and  
 KRISTEN VILLALOBOS, an individual,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN  
 FRANCISCO, a municipal entity,

Defendant.

Case No. 4:20-cv-3033-JST

**DECLARATION OF MICHAEL MASON IN  
 SUPPORT OF DEFENDANT CITY AND  
 COUNTY OF SAN FRANCISCO'S  
 OPPOSITION TO PLAINTIFFS' MOTION TO  
 ENFORCE STIPULATED INJUNCTION**

Hearing Date: May 23, 2024  
 Time: 2:00 p.m.  
 Place: Hon. Jon S. Tigar  
 Oakland Courthouse  
 Courtroom 6 – 2nd Floor  
 1301 Clay Street  
 Oakland, CA 94612

Trial Date: Not Set

1 I, MICHAEL MASON, declare:

2 1. I have personal knowledge of the matters stated herein except where otherwise stated,  
3 and if called and sworn as a witness, could and would competently testify thereto.

4 2. I work for the San Francisco Fire Department and am employed as the Section Chief of  
5 Administration within the Community Paramedicine Division.

6 3. The Community Paramedicine Division allows the Fire Department to collaborate with  
7 other City agencies and provide tailored services to traditionally under-privileged populations, some of  
8 whom are not served best by the standard emergency care system. This includes many of the City's  
9 unhoused residents. The Community Paramedicine Division provides proactive, compassionate, and  
10 respectful care that connects people to the appropriate resources for their medical, mental health, and  
11 social needs. Our teams can assist in providing immediate stabilization of medical and behavioral  
12 health emergencies, as well as helping our community to navigate an often-confusing array of services  
13 for those not experienced in obtaining care. This means helping to connect people to housing, primary  
14 and mental health care, detox services, pre-hospital treatment plans, and many other services to assist  
15 our populations in need.

16 4. The Community Paramedicine Division operates three programs: (1) EMS-6, which  
17 focuses on the highest users of the emergency care system, (2) Street Crisis Response Team, which  
18 responds to individuals experiencing behavioral health crises, and (3) Street Overdose Response  
19 Team, which responds in real-time to drug overdose survivors.

20 5. I have held my current role as Section Chief since December 2021. I previously worked  
21 as a paramedic for the Fire Department. My role immediately prior to becoming Section Chief was as  
22 a Rescue Captain in the EMS-6 Community Paramedicine Division.

23 6. As a result of my personal experience working with the Fire Department, I am aware of  
24 the outreach programs the Fire Department Participates in around homelessness and public health  
25 including the Street Crisis Response Team ("SCRT").

26 7. The San Francisco Fire Department launched SCRT on November 30, 2020 in  
27 partnership with the Department of Public Health ("DPH"). The team is dispatched in response to calls  
28 from the public made to San Francisco's 911 call center. SCRT provides rapid, trauma-informed care

1 to people in acute behavioral health crisis and to those who have needs that may not require an  
2 ambulance to transport to an emergency department.

3 8. Prior to March of 2023, DPH's Behavioral Health Services coordinated with the Fire  
4 Department on day-to-day oversight of SCRT and employed the behavioral health clinicians who  
5 participated in SCRT. In March 2023, the program shifted organizational structure to the Fire  
6 Department having primary day-to-day oversight of the team. The behavioral health clinicians who  
7 previously participated in SCRT moved to work with the newly created BEST Neighborhoods  
8 Program. At the same time, the role of DPH shifted to providing follow-up services for individuals  
9 who had contact with SCRT.

10 9. SCRT operates City-wide, including in the Tenderloin, 24 hours a day, seven days a  
11 week.

12 10. SCRT provides linkages to shelter, drug and alcohol sobering centers, mental health  
13 clinics and residential programs, urgent care, and care coordination.

14 11. City-wide in February 2024, SCRT received 1,289 calls for service, and was on-scene  
15 for a client encounter 1,097 times, resulting in 864 occasions where SCRT engaged with a person at  
16 the scene. Collectively from November 2020 through the end of February 2024, SCRT received  
17 38,678 calls for service, and was on-scene for a client encounter 29,996 times, resulting in 20,130  
18 occasions where SCRT engaged with a person at the scene. This data is publicly available online  
19 through SCRT's website at <https://www.sf.gov/street-crisis-response-team>.

20 12. I also instructed my team to further geo-fence SCRT's data to identify encounters and  
21 engagements in the Tenderloin. From January 1, 2021 through April 3, 2024, SCRT was dispatched to  
22 the Tenderloin 8,403 times, resulting in 4,638 medical assists, 2,357 transportation assists, 795 narkan  
23 assists, and 674 referrals to the Homeless Outreach Team ("HOT").

24 13. In addition to the initial care delivered on-scene, SCRT team members connect people  
25 with continued treatment, including psychiatric urgent care, sobering centers, social detox programs,  
26 withdrawal management, respite, shelter, and other services.

27 14. Based on my personal experiences and observations, I believe San Francisco makes  
28 reasonable efforts under the circumstances to achieve its goal of providing services to individuals in

1 crisis around the City and in the Tenderloin specifically, including connecting those individuals with  
2 housing and supporting those experiencing substance abuse disorders on City streets. Those efforts  
3 have the effect of reducing the City's tent count, including in the Tenderloin neighborhood.  
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5 I declare under penalty of perjury under the laws of the United States and the State of  
6 California that the foregoing is true and correct. Executed April 15, 2024 in San Francisco, California.  
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MICHAEL MASON